

WC 07-202

FCC/MELLON SEP 11 2007

STAMP & RETURN

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE
FORM 159

Approved by OMB
304A-0580
Page No. 1 of 2

(1) LOCKBOX # 358145		FCC/MELLON SEP 11 2007		SPECIAL USE ONLY	
				FCC USE ONLY	
SECTION A - PAYER INFORMATION					
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) Sylvia Lesse			(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$965.00		
(4) STREET ADDRESS LINE NO. 1 2154 Wisconsin Avenue NW					
(5) STREET ADDRESS LINE NO. 2					
(6) CITY Washington			(7) STATE DC	(8) ZIP CODE 20007	
(9) DAYTIME TELEPHONE NUMBER (include area code) (202) 333-5273			(10) COUNTRY CODE (if not in U.S.A.)		
FCC REGISTRATION NUMBER (FRN) REQUIRED					
(11) PAYER (FRN) 00109000918			(12) FCC USE ONLY		
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET					
(13) APPLICANT NAME SJI, LLC					
(14) STREET ADDRESS LINE NO. 1 112 West 10th Street					
(15) STREET ADDRESS LINE NO. 2 PO Box 188					
(16) CITY Larose			(17) STATE LA	(18) ZIP CODE 70373	
(19) DAYTIME TELEPHONE NUMBER (include area code) (985) 693-0215			(20) COUNTRY CODE (if not in U.S.A.)		
FCC REGISTRATION NUMBER (FRN) REQUIRED					
(21) APPLICANT (FRN) 0001718600			(22) FCC USE ONLY		
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET					
(23A) CALL SIGN/OTHER ID		(24A) PAYMENT TYPE CODE CUT		(25A) QUANTITY 1	
(26A) FEE DUE FOR (PTC) \$965.00		(27A) TOTAL FEE \$965.00		FCC USE ONLY	
(28A) FCC CODE 1		(29A) FCC CODE 2			
(23B) CALL SIGN/OTHER ID		(24B) PAYMENT TYPE CODE		(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)		(27B) TOTAL FEE		FCC USE ONLY	
(28B) FCC CODE 1		(29B) FCC CODE 2			
SECTION D - CERTIFICATION					
CERTIFICATION STATEMENT I, <u>Sylvia Lesse</u> , certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.					
SIGNATURE <u>Sylvia Lesse</u>			DATE <u>9/11/07</u>		
SECTION E - CREDIT CARD PAYMENT INFORMATION					
ACCOUNT NUMBER [REDACTED] EXPIRATION DATE [REDACTED]					
I hereby authorize the FCC to charge my credit card for the service(s) authorization herein described.					
SIGNATURE <u>Sylvia Lesse</u>			DATE <u>9/11/07</u>		

FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE (CONTINUATION SHEET) FORM 159-C		SPECIAL USE
Page No 2 of 2		FCC USE ONLY
USE THIS SECTION ONLY FOR EACH ADDITIONAL APPLICANT SECTION BB-ADDITIONAL APPLICANT INFORMATION		
(13) APPLICANT NAME Boston Ventures Limited Partnership VII		
(14) STREET ADDRESS LINE NO. 1 c/o Boston Ventures Management, LLC		
(15) STREET ADDRESS LINE NO. 2 125 High Street, 17th Floor		
(16) CITY Boston		(17) STATE MA
		(18) ZIP CODE 02110
(19) DAYTIME TELEPHONE NUMBER (include area code) (617) 350-1500		(20) COUNTRY CODE (if not in U.S.A.)
FCC REGISTRATION NUMBER (FRN) REQUIRED		
(21) APPLICANT (FRN) 0015526866		(22) FCC USE ONLY
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET		
(23A) CALL SIGN/OTHER ID		(24A) PAYMENT TYPE CODE
		(25A) QUANTITY
(26A) FEE DUE FOR (PTC)	(27A) TOTAL FEE	
	FCC USE ONLY	
(28A) FCC CODE 1		(29A) FCC CODE 2
(23B) CALL SIGN/OTHER ID		(24B) PAYMENT TYPE CODE
		(25B) QUANTITY
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE	
	FCC USE ONLY	
(28B) FCC CODE 1		(29B) FCC CODE 2
(23C) CALL SIGN/OTHER ID		(24C) PAYMENT TYPE CODE
		(25C) QUANTITY
(26C) FEE DUE FOR (PTC)	(27C) TOTAL FEE	
	FCC USE ONLY	
(28C) FCC CODE 1		(29C) FCC CODE 2
(23D) CALL SIGN/OTHER ID		(24D) PAYMENT TYPE CODE
		(25D) QUANTITY
(26D) FEE DUE FOR (PTC)	(27D) TOTAL FEE	
	FCC USE ONLY	
(28D) FCC CODE 1		(29D) FCC CODE 2
(23E) CALL SIGN/OTHER ID		(24E) PAYMENT TYPE CODE
		(25E) QUANTITY
(26E) FEE DUE FOR (PTC)	(27E) TOTAL FEE	
	FCC USE ONLY	
(28E) FCC CODE 1		(29E) FCC CODE 2
(23F) CALL SIGN/OTHER ID		(24F) PAYMENT TYPE CODE
		(25F) QUANTITY
(26F) FEE DUE FOR (PTC)	(27F) TOTAL FEE	
	FCC USE ONLY	
(28F) FCC CODE 1		(29F) FCC CODE 2

STAMP & RETURN

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

SJI, LLC,
Lafourche Telephone Company, LLC
and
SJI Networks, LLC dba Latelco Long Distance,

Transferors,

and

Boston Ventures Limited Partnership VII,

Transferee.

FILED/ACCEPTED

SEP 11 2007

Federal Communications Commission
Office of the Secretary

File No. _____

For Consent to Transfer Control pursuant to
Section 214 of the Communications Act of 1934,
as amended

**JOINT APPLICATION FOR TRANSFER OF CONTROL OF
DOMESTIC AND INTERNATIONAL AUTHORIZATIONS PURSUANT TO
THE COMMISSION'S STREAMLINED PROCESSING RULES**

SJI, LLC ("SJI"), Lafourche Telephone Company, LLC ("Latelco"), SJI Networks, LLC dba Latelco Long Distance ("Networks") (collectively, "Transferors" or the "SJI Companies"), and Boston Ventures Limited Partnership VII ("Transferee" or "Boston Ventures") hereby request authorization for the transfer of control of SJI, the parent company of Latelco and Networks, to Boston Ventures. Applicants seek streamlined processing of this request pursuant to sections 63.03(b)(2) and 63.24(c) of the Commission's Rules. This Application is being filed simultaneously with the International Bureau and the Wireline Competition Bureau.

Background

Applicant Latelco is a rural local exchange carrier ("LEC") providing local exchange and exchange access service to approximately 8,100 residential and 4,300 business access lines in rural portions of southern Louisiana. Latelco's sister corporation, Networks, provides interstate long distance services to residents of Latelco's service area, as well as global international resale services pursuant to Commission authorization under File No. ITC-214-20020402-00156.¹

Applicant Boston Ventures, together with its related funds, is a private equity firm that has been an active investor in the media, communications, and entertainment sectors of the economy since its founding in 1983. Over its 23-year history, Boston Ventures funds have invested approximately \$2.5 billion in over 70 companies. Boston Ventures typically acts as the lead investor in its investments, which include buyouts, recapitalizations, growth equity, and industry roll-ups.

Boston Ventures has extensive expertise in the telecommunications industry, with current investments that include a facilities-based local exchange carrier.² Boston Ventures is not a foreign carrier and does not hold any interests in foreign carriers. Pursuant to the

¹ The original authorization was granted to an SJI affiliate, MobilTel, LLC, which, after reorganization as MobilTel, L.L.C., subsequently conducted a *pro forma* assignment of the authorization to its parent, SJI, LLC (see Public Notice, DA No. 04-2552, Rep. No. TEL-00823, (ITC-AG-20040727—00324) (rel. Aug. 19, 2004)). Pursuant to Section 63.21(h) of the Commission's Rules, SJI, LLC informed the Commission by letter dated July 30, 2004, *inter alia*, that its wholly-owned direct subsidiary, SJI Networks, LLC dba Latelco Long Distance, was providing international service through authorization granted pursuant to File No. ITC-214-20020402-00156.

² Boston Ventures' related fund, Boston Ventures Limited Partnership V ("Boston Ventures V"), owns a significant, but not controlling interest in Integra Telecom, Inc., which holds international and domestic resale authorization and currently serves exchange, exchange access and interexchange customers in Arizona, California, Idaho, Minnesota, North Dakota, Oregon, Utah and Washington. Boston Ventures V was listed as the transferee in a 2000 application for transfer of control of Integra, but only as the first entity in a group of owners that collectively were acquiring a majority interest in Integra. See File No. ITC-T/C-20001222-00745. Integra's service area does not overlap with the service area of any of the SJI companies.

proposed transaction, Boston Ventures proposes to purchase an approximately 95% indirect interest in SJI, which would thereby become a subsidiary of Boston Ventures.³

After the contemplated transaction, SJI and its subsidiaries will continue to exist and operate in its same service territory, under the same trade name, providing service pursuant to existing rates, terms and conditions. The proposed transactions will, accordingly, be transparent to consumers.

The proposed transaction is entitled to streamlined treatment pursuant to section 63.03(b)(2)(iii) of the Commission's Rules because it would result in all Boston Ventures affiliates and subsidiaries having a market share in the interstate, interexchange market of less than 10%; the Boston Ventures local exchange subsidiaries having, in combination, fewer than 2% of the subscriber lines installed in the aggregate nationwide. Furthermore, the transaction would result in no new overlapping or adjacent service areas.

Description of the Transaction

This transaction will be accomplished through the sale of all of the membership interests of the current owners of SJI to SJI Holdings, LLC, a company created for the purpose of effecting this transaction, or to SJI itself. Following the sale, SJI will be a wholly-owned subsidiary of SJI Holdings.

Boston Ventures will hold approximately 95% of the membership interests of SJI Holdings and the current owners of SJI will hold the remaining membership interests. SJI Holdings will be controlled by Boston Ventures, which will name all of the voting members of its board. Latelco and Networks will continue to be wholly-owned subsidiaries of SJI and will continue their current operations.

³ Four individual members of the Brady family, the current owners, would hold the remaining interest. None of the members of the Brady family will hold any interest in Boston Ventures.

Transfer of Control of International Section 214 Authorization

Applicant Networks resells switched international long distance toll services to residential and business customers pursuant to an international Section 214 authorization granted by the Commission under File No. ITC-214-214-20020402-00156.⁴ In accordance with the requirements of Section 63.24(e) of the Commission's Rules, Applicants submit the following information:

(1) Name, address and telephone number of each applicant:

Transferors:

SJI, LLC
Lafourche Telephone Company, LLC
SJI Networks, LLC dba Latelco Long Distance
112 West 10th Street
PO Box 188
Larose, LA 70373
Tel: (985) 693-0215
Fax: (985) 693-6229

Transferees:

Boston Ventures Limited Partnership VII
c/o Boston Ventures Management, LLC
125 High Street
17th Floor
Boston, MA 02110
Tel: (617) 350-1500
Fax: (617) 350-1509

SJI Holdings, LLC
125 High Street
17th Floor
Boston, MA 02110
Tel: (617) 350-1500
Fax: (617) 350-1509

⁴ See n. 1.

(2) Government, state or territory under the laws of which each corporate or partnership applicant is organized

SJI, Latelco and Networks are limited liability companies organized under the laws of the state of Louisiana.

Boston Ventures Limited Partnership VII is a limited partnership organized under the laws of the state of Delaware.

SJI Holdings is a limited liability company organized under the laws of the state of Delaware.

(3) Name, title, post office address, and telephone number of the officer or contact point to whom correspondence concerning the application is to be addressed

For SJI, Latelco and Networks:

Toby Brady
112 West 19th Street
PO Box 188
Larose, LA 70373
Tel: (985) 693-0215
Fax: (985) 693-6229

With a copy to:

Sylvia Lesse
Communications Advisory Counsel, LLC
2154 Wisconsin Avenue, NW
Washington, DC 20007
Tel. 202-333-5273
Fax 202-333-5274

For Boston Ventures and SJI Holdings:

J.G. Harrington
Dow Lohnes P.L.L.C.
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036
Tel. 202-776-2818
Fax 202-776-2222

(4) Statement as to whether the applicant had previously received authority under Section 214 of the Act.

Applicant Boston Ventures holds a controlling interest in En-Touch Systems, Inc., the wholly-owned subsidiary of which, ETS Telephone Company, Inc., holds international resale authority pursuant to File No. ITC-214-19960311-00007. Other than the international authorization of Networks, the subject of this application, no other applicant has applied for or holds any Section 214 authorization. As noted in footnote 2, Boston Ventures V was listed as one of several transferees in an application for transfer of control of Integra Telecom, but does not hold a controlling interest in that company.

(5) Name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten percent of the equity of the applicant entities:

Transferor:

SJI Networks, LLC and Lafourche Telephone Company, LLC are wholly-owned subsidiaries of SJI, LLC. The 10% or greater direct owners of SJI, LLC are the James Patrick ("Pat") Brady family, as follows:

<u>Name and Address</u>	<u>Percentage Ownership</u>	<u>Citizenship</u>	<u>Principal Business</u>
James Patrick ("Pat") Brady PO Box 188 Larose, LA 70373	31.52%	USA	telecommunications
James Patrick Brady Children's Trust (Toby Brady and Todd Brady, co-trustees) PO Box 188 Larose, LA 70373	28.76%	LA	investments
Brady Investment Trust (Toby Brady and Todd Brady, co-trustees) PO Box 188 Larose, LA 70373	36.16%	LA	investments
Pat & Kate Brady Family Foundation (Pat Brady, President) PO Box 188 Larose, LA 70373	3.56	LA	investments

Transferee:

The following entity will own 10 percent or more of the equity of SJI:

<u>Name and Address</u>	<u>Percentage Ownership</u>	<u>Citizenship</u>	<u>Principal Business</u>
SJI Holdings, LLC	100%	US	investments

The following entity will own 10 percent or more of the equity of SJI Holdings:

<u>Name and Address</u>	<u>Percentage Ownership</u>	<u>Citizenship</u>	<u>Principal Business</u>
Boston Ventures Limited Partnership VII	approx. 95%	US	investments

The following entities hold 10 percent or more of the equity of Boston Ventures Limited Partnership VII or hold general partnership interests:

<u>Name and Address</u>	<u>Percentage Ownership</u>	<u>Citizenship</u>	<u>Principal Business</u>
Hartford Financial Services Group, Inc.* Hartford Plaza Hartford, CT 06115	approx. 11% (limited partner)	US	insurance and investments
State of Connecticut Retirement Plans and Trust Funds 55 Elm Street Hartford, CT 06106	approx. 20% (limited partner)	US	investment
Boston Ventures Company VII, LLC c/o Boston Ventures Mgt., LLC 125 High Street 17th Floor Boston, MA 02110	2% (general partner)	US	investment

*The Hartford Financial Services Group, Inc. holds this interest indirectly through its subsidiaries, Hartford Life Insurance Co. and Hartford Fire Insurance Co., neither of which

holds a ten percent interest in Boston Ventures. The Hartford Financial Services Group, Inc. is a Delaware corporation and is publicly traded on the New York Stock Exchange. Based upon a review of the most recent information available, there are no ten percent or more shareholders of The Hartford Financial Services Group, Inc.

Boston Ventures Company VII, LLC is the general partner ("GP") of applicant Boston Ventures. Its principal business is investments. The managing directors of the GP control the GP. Set forth below are all of the managing directors of the GP. This list includes all of the owners of the GP who have a ten percent or greater interest in the GP. No individual listed below holds a fifty percent or greater interest in the GP.

Name	Address	Citizenship
Barry Baker	c/o Boston Ventures Mgt., LLC 125 High Street 17th Floor Boston, MA 21001	USA
Anthony J. Bolland**	c/o Boston Ventures Mgt., LLC 125 High Street 17th Floor Boston, MA 21001	United Kingdom
Roy F. Coppedge	c/o Boston Ventures Mgt., LLC 125 High Street 17th Floor Boston, MA 21001	USA
Andrew C. Davis	c/o Boston Ventures Mgt., LLC 125 High Street 17th Floor Boston, MA 21001	USA
Elizabeth Granville-Smith	c/o Boston Ventures Mgt., LLC 125 High Street 17th Floor Boston, MA 21001	USA
Gerald S. Hobbes	c/o Boston Ventures Mgt., LLC 125 High Street 17th Floor Boston, MA 21001	USA

Vikrant Raina**

c/o Boston Ventures Mgt., LLC
125 High Street
17th Floor
Boston, MA 21001

India

** Pursuant to the terms of the GP's operating agreement, non-US citizens may not participate in any matters relating to any media and regulated communications enterprises of the GP, including any media or communications companies in which the GP or Boston Ventures Limited Partnership VII may invest, and are subject to other restrictions on their participation in the operation of the GP and the limited partnership in accordance with the FCC's insulation criteria.

(6) Certification as to whether or not Transferee is, or is affiliated with, a foreign carrier.

Boston Ventures certifies that neither it nor any affiliate or successor is or will be foreign carriers, and that neither it nor any affiliate or successor is or will be affiliated with any foreign carrier.

(7) Certification as to whether or not Transferee seeks to provide international telecommunications services to any country for which certain conditions are true.

Boston Ventures certifies that neither it nor any affiliate or successor will provide international telecommunications to any destination country for which Boston Ventures or an affiliate or successor (1) is a foreign carrier in that country; (2) controls a foreign carrier in that country; (3) is owned more than 25% by or controlled by an entity that controls a foreign carrier in that country.

(8) Showing regarding provision of international telecommunications service to a country where the applicant is a foreign carrier or is affiliated with a foreign carrier.

N/A

(9) Regulatory classification under Section 63.10 of the Rules for foreign-affiliated carrier.

N/A

(10) Certification that applicant has not agreed to accept special concessions directly or indirectly from any foreign carrier.

Applicants certify they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any US international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.

(11) Certification pursuant to 47 C.F.R. §§ 1.2001-1.2003 that no party to the application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 583

Applicants hereby certify, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of their knowledge, information, and belief, no party to the application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 583.

(12) Qualification for streamlined processing.

This application qualifies for streamlined processing under Sections 63.12(a) and (b) of the Commission's rules. No party is affiliated with any foreign carrier in any destination market. No party has an affiliation with a dominant US carrier whose international switched or private line services the applicants seek authority to resell, and none is anticipated as a result of the public offering which likely will result in widely held interests. No party to this application seeks authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines. Authorization is sought to complete a public sale which would continue the current operations as a non-dominant carrier reselling the international switched services of one or more unaffiliated US carriers.

Transfer of Control of Domestic Section 214 Authorizations

Pursuant to Section 63.04(b) of the Commission's Rules, applicants submit information required pursuant to Sections 63.04(a)(6) through 63.04(a)(12) of the Commission's Rules:

(1) Description of the transaction

This application proposes the transfer of control of the domestic Section 214 authorization of Latelco and Networks through a sale of approximately 95 percent of the interests of their parent, SJI, LLC to Boston Ventures, resulting in both Latelco and Networks being indirect - subsidiaries of Boston Ventures. State authorization to conduct the proposed transaction also will be sought by Applicants.

After the proposed transaction, Latelco and Networks will continue to operate in the same service territory, under the same trade name. The companies will continue to offer services pursuant to their current rates, terms and conditions. No carrier change charges are associated with the transaction, and no customer service or billing contact information will change as a result of the transfer. The transaction will not affect customers' preferred carrier freezes.

(2) Description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area

Transferors:

Latelco provides incumbent local exchange and exchange access services to approximately 12,300 access lines in the exchanges of Larose, Grande Isle, Golden Meadow, Leeville and Galliano, Louisiana. A map of Latelco's service area is appended hereto as Attachment 1.

Networks (doing business as Latelco Long Distance) offers IXC services to the local service subscribers of Latelco, currently serving approximately 7300 customers. Latelco also offers dial-up Internet services within its telephone service area.

Vision Communications, LLC ("Vision"), a wholly-owned subsidiary of Latelco, offers video programming service in parts of the Latelco service area as well as in other portions of Lafourche Parish in southern Louisiana. Vision also offers broadband Internet services throughout its service territory.

Transferee:

Boston Ventures controls En-Touch Systems, Inc., the parent company of ETS Telephone Company, Inc., a local exchange carrier offering facilities-based local exchange and exchange access services, as well as domestic and international long distance telephone services to approximately 10,000 business and residential customers in the Houston, Texas area. In addition, Transferee's sister fund, Boston Ventures Limited Partnership V owns a non-controlling interest in Integra Telecom, Inc., which holds international and domestic resale authorization and currently serves exchange, exchange access and interexchange customers in Arizona, California, Idaho, Minnesota, North Dakota, Oregon, Utah and Washington.

Boston Ventures' related funds also hold a significant, but not controlling interest in Harron Communications, LP, a cable television company operating in the Northeast United States, and a controlling interest in Vista III Media Holdings, LLC, a cable MSO operating in the southeastern United States. In addition, Boston Ventures holds a non-controlling interest in Rural Cellular Corporation, a rural cellular telephone provider operating throughout the United States (although not within the service territory of the SJI companies).

(3) Statement as to how the application fits into one or more of the presumptive streamlined categories in Section 63.03 of the Commission's Rules or why it is otherwise appropriate for streamlined treatment

The instant Application is entitled to streamlined processing under Section 63.03(b)(2) (iii) of the Commission's Rules because (a) applicant local exchange carriers collectively serve fewer than two (2) percent of the nation's subscriber lines; to the extent competitive local exchange service is offered, it is offered within the service territory of a dominant local exchange telephone company that is not a party to the proposed transaction; and there are no new overlapping or adjacent service areas among applications arising as a result of the proposed transactions; and (b) the proposed transfer would result in Boston Ventures subsidiaries and affiliates having a market share in the interstate, interexchange market of less than 10 percent.

Altogether, the Applicants' local exchange operations serve approximately 26,000 access lines in rural portions of southern Louisiana and in metropolitan Houston. This comprises a minute fraction of the 180,000,000 access lines in the nation. See Federal Communications Commission: Trends in Telephone Service, April 2005 (Table 8.1, End-User Switched Access Lines as of June, 2004). Further, Applicants' relevant service territories neither overlap nor are adjacent.

No party is affiliated with a facilities-based domestic toll carrier. All domestic toll services are offered through the resale of the services of unaffiliated, facilities-based exchange carriers. The Applicants' combined interexchange operations serve fewer than one percent (1.0%) of the interstate, interexchange market.

The proposed transaction will have no adverse effect on competition. The Applicants' subsidiaries' markets are individually and collectively so small that the proposed transaction *will have no perceptible effect on competition. Grant of streamlined treatment for this* Application is consistent with Commission precedent.

(4) Identification of all other Commission applications related to the same transaction

The following wireless interests are involved in the proposed transaction, and, accordingly, joint applications seeking authorization to transfer control of these licenses will be filed with the Commission:

KNKL208 (Rural Radio)

KNKL295 (Rural Radio)

KNKP524 (Rural Radio)

(5) Statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure

Neither party to the transaction is facing imminent business failure. Therefore, Applicants are not requesting special consideration for this reason.

(6) Identification of any separately filed waiver requests being sought in conjunction with the transaction

No separately filed waiver requests are being sought in conjunction with the transaction.

(7) Statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets

The proposed ownership structure and investment participation will enable the continued provision of high-quality communications services to SJI customers. In addition, economic and strategic efficiencies will result from the transaction, benefiting the current subscribers of both companies. Because the telecommunications providers owned or controlled by Boston Ventures do not provide service in the areas served by the SJI companies, competition will not be adversely affected by consummation of the proposed transaction.

Conclusion

For the foregoing reasons, the Applicants respectfully request that the Commission grant the requested on a streamlined basis.

Respectfully submitted,
SJI, LLC
Lafourche Telephone Company, LLC
SJI Networks, LLC dba Latelco Long Distance

By: Sylvia Lesse
Sylvia Lesse
Their Counsel
Communications Advisory Counsel, LLC
2154 Wisconsin Avenue, NW
Washington, DC 20007
(202) 333-5273

and

Boston Ventures Limited Partnership VII

By: J.G. Harrington (al)
J.G. Harrington
Its Counsel
Dow Lohnes P.L.L.C.
1200 New Hampshire Avenue, NW
Washington, DC 20036
(202) 776-2818

Date: September 11, 2007

DECLARATION OF TOBY BRADY

I, Toby Brady, President of SJI, LLC, Vice President of SJI Networks, LLC, and Vice President of Lafourche Telephone Company, LLC (collectively, the "SJI Companies"), do hereby declare under penalties of perjury that I have read the foregoing "JOINT APPLICATION FOR TRANSFER OF CONTROL OF DOMESTIC AND INTERNATIONAL AUTHORIZATIONS PURSUANT TO THE COMMISSION'S STREAMLINED PROCESSING RULES," and the information contained therein regarding the SJI Companies is true and accurate to the best of my knowledge, information, and belief.

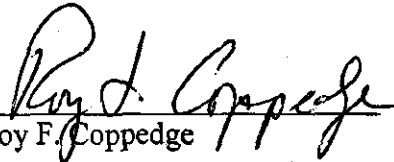
Date 9/10/07


Toby Brady

DECLARATION OF ROY F. COPPEDGE

I, Roy F. Coppedge, Managing Director of Boston Ventures Company, VII, LLC, the general partner of Boston Ventures Limited Partnership VII ("Boston Ventures"), do hereby declare under penalties of perjury that I have read the foregoing "JOINT APPLICATION FOR TRANSFER OF CONTROL OF DOMESTIC AND INTERNATIONAL AUTHORIZATIONS PURSUANT TO THE COMMISSION'S STREAMLINED PROCESSING RULES," and the information contained therein regarding Boston Ventures and its affiliates is true and accurate to the best of my knowledge, information, and belief.

Date September 10, 2007


Roy F. Coppedge